

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	No. 4:17-cv-2455
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

DECLARATION OF STEVEN HOFFMANN

I, Steven Hoffmann, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I am a Legal Observer coordinator with the National Lawyers Guild of St. Louis and have attended hundreds of protests in that capacity.
3. I drove to the Central West End neighborhood of the City of St. Louis at approximately 11:15 p.m. on Friday, September 15, so that I could observe protests following the acquittal of Officer Jason Stockley.
4. I was wearing a bright green hat identifying me as a Legal Observer.
5. After I parked my vehicle, I walked south on Euclid Avenue, where I saw a line of several dozen St. Louis Metropolitan police officers dressed in tactical gear, including helmets, and carrying batons and full-body shields, at the intersection of Euclid Avenue and

Pershing Place. I later learned there were additional police officers at other locations in the neighborhood.

6. The police had closed Euclid.

7. In front of the police line on Euclid, I saw about two dozen pedestrians, including protestors, residents, and patrons of area businesses.

8. I did not see any pedestrian commit any act of force or violence or any damage to property. I did not see any signs of property damage at that time. I was myself unarmed, nonviolent, not committing any crime, and posing no threat to any person or property.

9. Suddenly, and without warning, police officers in that riot line began to yell. I heard several officers banging long batons on the ground.

10. Police began to shine red laser gun sights on people. I looked down at my chest and stomach, and the red laser was shining on me. I took several steps to get out of the line of fire, but the laser came back as soon as I stopped moving. The police were pointing some kind of gun at me.

11. I was afraid for my life, because I thought that the officers were going to fire bullets at me. I heard no warning about the deployment of chemical munitions.

12. I yelled to someone next to me "we need to get out of here fast." As I was running, I heard a loud, deep clicking noise, and then I began to hear some projectiles hitting the ground all around me.

13. All of the other pedestrians ran north on Euclid as well. There was nowhere else to go, because there were fences or walls against the sidewalk.

14. I began to smell a strange smell. I believe they were firing pepper balls at me, some kind of balls or bullets filled with pepper spray, or mace.

15. I looked back behind me, and police were running toward us in a line. They continued to follow and shoot at the pedestrians until we reached McPherson Avenue, where I tried to take shelter next to a bookstore.

16. I thought that I could catch my breath for a moment, but police continued to deploy tear gas canisters into the intersection.

17. There must have been several canisters, because I saw smoke coming from three different places in the intersection. No one who was standing there was doing anything wrong that I could see.

18. I ran west on McPherson and stopped behind a car. I could not hear the police, but I could see more canisters of tear gas hitting the ground and releasing gas, and I could smell the gas.

19. I started to feel pain all over my face, and in my eyes. It felt like my skin was burning. I could not breathe without inhaling a noxious smell and taste. It is hard to describe, but I felt like many small pins were piercing my skin and causing me to itch. It was very uncomfortable and frightening.

20. I did not hear police make any warning before they fired or threw the tear gas, or before they shot at me with the pepper balls. I had been standing close enough to their line that I would have heard it if a police officer had shouted or used any amplification, such as a megaphone.

21. After more than 30 minutes, police started to move in a line, and they all followed behind one another and marched back south on Euclid, where we had all come from.

22. Once the police left, I returned to Euclid. I could see the police several blocks south of me, so I walked back to where they had shot at me before. I was afraid to go back, but I was even more afraid for people who were further south down Euclid.

23. Instead of a line of police in tactical gear, or “riot gear,” there were several police officers in normal “soft” uniforms. They told me that the sidewalk was closed, and that I needed to leave the area and go home.

24. I was not committing any crime or posing any threat to any person or property. I was not part of a larger group.

25. I could see that the tactical vehicle, and officers in tactical gear were far away, maybe 4 or 5 blocks south, and I told the officer that I wanted to film what they were doing with my smartphone, but it was too far away to really see what was happening up there.

26. An officer in a white shirt came up and asked if there was a problem, and I told him that police did not give any warning before they tear gassed us and shot at us, and he said, “I don’t need to give you a fucking warning.”

27. Eventually I was able to walk south on Euclid to Maryland Avenue after the police moved south.

28. All in all, I saw at least one hundred police officers standing in and around that intersection.

29. In November 2014, during the protests following the acquittal of former Ferguson police officer Darren Wilson, I was near the intersection of Arsenal and Grand in St. Louis city to observe in my capacity as a Legal Observer.

30. I saw the St. Louis Metropolitan police department deployed chemical agents there without warning.

31. In August 2015, during the protests and public grieving following the shooting of St. Louis resident Mansur Ball-Bey, I was near the intersection of Walton and Page in St. Louis city to observe in my capacity as a Legal Observer.

32. I saw the St. Louis Metropolitan police department deployed chemical agents there without warning.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 27th day of September, 2017.

By: /s/ Steven Hoffmann
Steven Hoffmann